## STEPHAN ZOURAS, LLP

## FIRM PROFILE

STEPHAN ZOURAS, LLP, is a law firm that concentrates on helping people in class and individual civil litigation. The firm's attorneys have broad experience in the areas of wage and hour litigation and other employment matters, serious personal injury, consumer protection, products liability, business disputes and other complex litigation.

Our Chicago-based firm litigates cases in federal and state courts throughout the United States. The firm's two founding partners, James B. Zouras and Ryan F. Stephan, have successfully prosecuted claims ranging from individual wrongful death and other catastrophic injury cases to complex, multi-district class and collective actions involving tens of thousands of individuals and some of the largest corporations in the world.

## PRINCIPAL ATTORNEYS

**James B. Zouras** is a 1995 graduate of DePaul University College of Law, where he served as Editor of the Law Review, finished in the top 10% of his class and was admitted to the Order of the Coif. He has successfully handled over a dozen major jury trials along with a like number of appeals. In 2000, he was named among the *Chicago Law Bulletin's* "Top 40 Lawyers Under Age 40," one of the youngest lawyers ever bestowed that honor.

**Ryan F. Stephan** graduated from Chicago Kent College of Law in 2000. He has served as lead or co-lead counsel on numerous complex class and collective action cases involving wage and hour matters and has helped recover damages for tens of thousands of wronged employees.

Mr. Stephan and Mr. Zouras are admitted to the Trial Bar of the United States District Court for the Northern District of Illinois and have been admitted or admitted pro hac vice to prosecute wage and hour cases in the Central District of Illinois, the Southern and Eastern Districts of New York, the Superior Court for the State of California, the Eastern District of Missouri, the District of Maryland, the Southern District of Ohio, the Northern and Southern Districts of Florida, the District of Massachusetts, the District of New Jersey, the District of Minnesota, the Western District of Washington and the Southern and Northern Districts of Iowa.

In 2009, 2010 and 2011, Mr. Zouras and Mr. Stephan were nominated by *Chicago Magazine's* Super Lawyer Section as two of the top attorneys in Illinois, a distinction given to no more than 5% of the lawyers in the state.

## REPRESENTATIVE CLASS/COLLECTIVE ACTION CASES

The firm's partners have been appointed lead or co-lead counsel in several pending class and collective actions including:



<u>Litz et al. v. The Saint Consulting Group et al.</u>, No. 11-10693 (United States District Court, District of Massachusetts) On February 17, 2012 the Court granted Stephan Zouras, LLP's motion for conditional class certification and appointed Stephan Zouras, LLP as class counsel.

<u>Davis</u>, et al. v. <u>TPI Iowa</u>, No. 11 CV 233 (United States District Court for the Southern District of Iowa) On January 17, 2012, Stephan Zouras, LLP achieved conditional certification for a class of over 1,000 production employees in the state of Iowa.

<u>Hawkins et al v. Securitas</u>, No. 09 C 3633 (United States District Court for the Northern District of Illinois, Eastern Division) On November 18, 2011 the Court certified a Rule 23 class of approximately 10,000 officers who alleged they were not paid for all time spent in training and orientation. Stephan Zouras, LLP was appointed class counsel.

<u>Lacy, et al. v. The University of Chicago Medical Center</u>, No. 11 CV 5268 (United States District Court for the Northern District of Illinois, Eastern Division) On November 18, 2011, the Court conditionally certified a collective class of respiratory therapists and appointed Stephan Zouras, LLP as class counsel.

Faust, et al v. Comcast Corporation, No. 10 CV 2336 (United States District Court for the Northern District of Maryland) On November 1, 2011, the Court granted Plaintiffs' motion for conditional certification and appointed Stephan Zouras as lead counsel for a class of call center employees.

Garcia, et al. v. Loffredo Fresh Produce Co., Inc., No. 11 CV 118 (United States District Court for the Southern District of Iowa) On August 29, 2011, the Court granted Plaintiffs' motion for conditional certification and appointed Stephan Zouras as lead counsel for a class of production employees.

Larsen, et al. v. Clearchoice Mobility, Inc., et al., No. 11 CV 1701 (United States District Court for the Northern District of Illinois) On July 25, 2011, the Court granted Plaintiffs' motion for conditional certification and appointed Stephan Zouras as lead counsel for a class of retail sales consultants.

Johnson, et al. v. AMTEC, LLC, et al., No. 10 CV 7861 (United States District Court for the Northern District of Illinois) On July 7, 2011, Stephan Zouras, LLP achieved conditional certification for a group of cable technicians previously employed by AMTEC, LLC in the state of Illinois.

<u>Smith, et al. v. Safety-Kleen Systems, Inc.</u>, No. 10 CV 6574 (United States District Court for the Northern District of Illinois) Stephan Zouras, LLP achieved collective action certification and has been appointed class counsel for a collective action class of chemical handlers.

Ellenbecker, et al. v. North Star Cable Construction, Inc., et al., No. 09 CV 7293 (United States District Court for the Northern District of Illinois) Stephan Zouras, LLP achieved Rule 23 certification and were appointed lead counsel for a class of several hundred cable technicians seeking unpaid overtime wages and the recovery of improper deductions from their pay.

Kernats, et al. v. Comcast Corporation, No. 09 CV 3368 (United States District Court for the Northern District of Illinois) On October 20, 2010 the Court granted Plaintiffs' motion for class certification, certified a class of several thousand Customer Service Representatives seeking unpaid wages and overtime and appointed Stephan Zouras, LLP as lead counsel for the class.

Farmer, et al. v. DirectSat, USA, LLC, No. 08 CV 3962 (United States District Court for the Northern District of Illinois, St. Eve, J.) Stephan Zouras, LLP have been appointed class counsel for a class of over 600 satellite dish technicians alleging claims for unpaid overtime wages.

Howard, et al. v. Securitas Security Services USA, Inc. No. 08 CV 2746 (United States District Court for the Northern District of Illinois) Stephan Zouras, LLP, represents over one thousand security guards seeking damages under the FLSA for unpaid wages and overtime.

Franco, et al. v. Ideal Mortgage Bankers, d/b/a Lend America, No. 07 CV 3956 (United States District Court for the Eastern District of New York) Stephan Zouras, LLP achieved Section 216(b) certification of a collective class of several hundred loan officers who were deprived of minimum wages and overtime in violation of federal and state law.

The firm's partners were appointed lead or co-lead counsel and achieved six and seven-figure verdicts or settlements in several resolved class and collective actions including:

Etter v. Trinity Structural Towers, No. 11 CV 249 (United States District Court for the Southern District of Iowa) (Final approval – 1/26/12). As class counsel, Stephan Zouras, LLP achieved a settlement on behalf of a collective class of production employees.

<u>Daniels et al. v. Premium Capital Financing</u>, No. 08 CV 4736 (United States District Court for the Eastern District of New York) (Final Verdict – DATE) Stephan Zouras, LLP were appointed lead counsel and achieved a jury verdict in excess of \$9,000,000.00 on behalf of over 150 loan officers who were deprived of minimum wages and overtime pay.

Petersen, et al v. Marsh USA, Inc. et al., No. 10 CV 1506 (United States District Court for the Northern District of Illinois) Stephan Zouras, LLP achieved a six figure settlement on behalf of over 30 analysts who claimed they were misclassified under the FLSA.

<u>Thompson v. World Alliance Financial Corp.</u>, No. 08 CV 4951 (United States District Court for the Eastern District of New York) (Final Approval – 8/5/11). Stephan Zouras, LLP were appointed lead counsel and achieved a settlement on behalf of a class of over one hundred loan officers deprived of minimum wages and overtime in violation of federal and state law.

<u>Vaughan v. Mortgage Source LLC, et al.</u>, No. 08 CV 4737 (United States District Court for the Eastern District of New York) (Final Approval -6/16/11). Stephan Zouras, LLP were appointed lead counsel and achieved a settlement on behalf of a class of loan officers deprived of minimum wages and overtime in violation of federal and state law.

<u>Harris, et al. v. Cheddar's Casual Café, Inc.</u>, Case No. 51 460 00557 10 (AAA Arbitration) (Final approval – 6/1/11). Stephan Zouras served as lead counsel in six-figure class settlement on behalf of over 100 restaurant workers deprived of minimum wages and overtime.

Brown et al v. Vision Works, et al., Case No. 10 CV 01130 (United States District Court for the Northern District of Illinois) (Final approval – 3/4/11). As lead class counsel, Stephan Zouras, LLP achieved a settlement on behalf of retail store managers improperly classified as exempt from overtime.

Havard v. Osceola Foods, Inc., et al., Case No. LA CV 0111290 (Iowa District for Clarke County, Iowa) (Final approval – 2/28/11). As lead class counsel, Stephan Zouras, LLP achieved a class settlement on behalf of meat processing plant employees who were not properly paid for donning and doffing activities performed before their shifts, during meal breaks and after their shifts.

<u>Lagunas v. Cargill Meat Solutions Corp.</u>, Case No. 10 CV 00220 (United States District Court for the Southern District of Iowa) (Final approval -1/27/11). Stephan Zouras served as co-lead counsel in class settlement on behalf of meat processing plant employees who were not properly paid for donning and doffing activities performed before their shifts, during meal breaks and after their shifts.

Anderson v. JCG Industries, Inc., Case No. 09 CV 1733 (United States District Court for the Northern District of Illinois) (Final approval -9/2/10) As lead class counsel, Stephan Zouras, LLP achieved a six-figure settlement on behalf of meat processing plant employees who were not properly paid for time worked before their shifts, during meal breaks and after their shifts.

Perkins, et al. v. Specialty Construction Brands, Inc., No. 09 CV 1678 (United States District Court for the Northern District of Illinois) (Final approval – 11/15/09). As lead class counsel, Stephan Zouras, LLP achieved a six figure wage and hour settlement on behalf of a collective class of plant employees for claims of unpaid overtime, including time worked before the start of their shifts, during breaks and after the end of their shifts.

Wineland, et al. v. Casey's General Stores, Inc., No. 08 CV 00020 (United States District Court for the Southern District of Iowa) (Final approval – 10/22/09). Stephan Zouras, LLP along with co-counsel was appointed lead counsel and achieved a seven figure settlement on behalf of a Section 216(b) collective class and Rule 23 class of over 10,000 cooks and cashiers for unpaid wages, including time worked before and after their scheduled shifts and while off-the-clock.

Cedeno, et al. v. Home Mortgage Desk, Corp., et al., No. 08 CV 1168 (United States District Court for the Eastern District of New York) (Final approval – 6/15/10). Stephan Zouras, LLP along with co-counsel was appointed lead counsel and achieved a six figure settlement on behalf of a Section 216(b) collective class of loan officers deprived of overtime wages.

Jones, et al. v. Casey's General Stores, Inc., No. 07 CV 400 (United States District Court for the Southern District of Iowa) (Final approval – 10/22/09). Stephan Zouras, LLP along with cocounsel was appointed lead counsel and achieved a seven figure settlement on behalf of a

Section 216(b) collective class and Rule 23 class of assistant store managers for unpaid wages, including time worked before and after their scheduled shifts and while off-the-clock.

<u>Huebner et al. v. Graham C Stores</u>, No. 06 CH 09695 (Circuit Court of Cook County, Chancery Division, State of Illinois) (concluded 11/15/07) Ryan Stephan of Stephan Zouras, LLP served as co-lead counsel in this wage and hour case involving claims for unpaid wages by a class of gas station employees. Mr. Stephan helped achieve a six figure settlement for over 100 employees.

<u>Ciesla, et al. v. Lucent Technologies, Inc.</u>, No. 05 CV 1641 (United States District Court for the Northern District of Illinois) (concluded 7/31/06) The firm's partners served as co-lead counsel in this breach of contract class action against a high-tech communications company. Mr. Stephan and Mr. Zouras helped obtain a seven figure settlement on behalf of the class.

Reinsmith, et al. v. Castlepoint Mortgage, No. 05 CV 01168 (U.S. District Court, Eastern District of Massachusetts) (concluded 4/3/07) The firm's partners served as co-lead counsel in this action brought on behalf of a collective class of loan officers seeking to recover unpaid overtime. Mr. Stephan and Mr. Zouras helped achieve a seven figure settlement on behalf of over 100 loan officers in this case.

Stuart, et al. v. College Park, et al., No. 05 CH 09699 (Circuit Court of Cook County, Chancery Division, State of Illinois) (concluded 12/11/07) The firm's partners served as co-lead counsel in this case brought on behalf of a class of tenants who were seeking the refund of their security deposits. As a result of their efforts, Mr. Stephan and Mr. Zouras helped achieve a six figure settlement on behalf of a class of over 100 tenants.

Casale, et al. v. Provident Bank, No. 04 CV 2009 (U.S. District Court for the District of New Jersey) (concluded 7/25/05) The firm's partners served as co-lead counsel in this case brought on behalf of a collective class of over 100 loan officers who were seeking damages based on wage and hour violations of the FLSA. As a result of their efforts, Mr. Stephan and Mr. Zouras helped achieve a seven figure settlement on behalf of the Plaintiffs.

Kutcher, et al. v. B&A Associates, No. 03 CH 07610 (Circuit Court of Cook County, Chancery Division, State of Illinois) (concluded 11/20/06) The firm's partners served as co-lead counsel in this case brought on behalf of a class of tenants who were seeking damages based on alleged security deposit violations. As a result of their efforts, Mr. Stephan and Mr. Zouras helped achieve a six figure settlement on behalf of a class of over 100 tenants.

Corbin, et al. v. Barry Realty, No. 02 CH 16003 (Circuit Court of Cook County, Chancery Division, State of Illinois) (concluded 3/22/05) The firm's partners served as co-lead counsel in this case brought on behalf of a class of tenants who were seeking the refund and interest on their security deposits as called for by the Chicago Residential Landlord Tenant Ordinance. As a result of their efforts, Mr. Stephan and Mr. Zouras helped achieve a six figure settlement on behalf of a class of over 100 tenants.

Perez, et al. v. RadioShack Corporation, No. 02 CV 7884 (United States District Court for Northern District of Illinois) (Final approval – 9/14/07) The firm's partners served as co-lead counsel in this nationwide Fair Labor Standards Act ("FLSA") overtime action brought on behalf of 4,000 retail store managers. Plaintiffs claimed they were improperly classified as exempt from the FLSA and owed overtime compensation for all hours worked in excess of 40 each week. In a case of first impression, the Court granted summary judgment in favor of a sub-class of Plaintiffs who did not "regularly and customarily" supervise at least 80 hours of subordinate time per week at least 80% of the time as required by the executive exemption of the FLSA. The reported decision is *Perez v. RadioShack Corp.*, 386 F.Supp. 979 (N.D.Ill. 2005). As a result of the efforts of Plaintiffs' counsel, Plaintiffs obtained a nearly \$9 million settlement on the eye of trial.